

## Statement of Claim II

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The petitioner further claims that it was Samuel Portis and Frank Lees' positions as an elder and an ministerial servant that created their opportunity to molest ~~quater~~ petitioner William L. Harding. Without these positions inside the Jehovah's Witness Organization the opportunity would not have arisen. It was these positions given by Watch Tower Bible and Tract Society of New York Inc; Christian Congregation of Jehovah's Witnesses Inc, Christian Congregation of Jehovah's Witnesses of Muskogee Oklahoma; that allowed the petitioner William L. Harding & his mother (a witness) & father to come to trust these men. Therefore Samuel Portis' and Frank Lees' position in the Jehovah's Witnesses faith was a necessary factor of the molestation of the petitioner.

Watch Tower as the top of the hierarchy of the Jehovah's Witness -



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organisation, with the Christian Congregation of Jehovah's Witnesses being only second to Watch Tower. Then it slows down to the individual Congregations. It was the hiring/retention of these men by Watch-Tower and Christian Congregation of Jehovah's Witnesses Inc, Christian Congregation of Jehovah's Witnesses of Muskogee Oklahoma, that gives them direct liability of the molestation. The neglect pleaded is that of the employer itself.

Both Samuel Portis and Frank Lee were given these positions of trust and authority as a Jehovah's Witness elder, Ministerial servant, religious instructor, counselor surrogate parent .... where they were able to use their position to commit the wrong acts against petitioner William L. Harding

Furthermore the petitioner states that the molestation occurred during or around religious activities which were and are sponsored and



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supported by Watch Tower and  
Christian Congregation of Jehovah's Witnesses  
Inc. Christian Congregation of Jehovah's Witnesses  
of Muskogee Oklahoma.

Under the theory of negligent hiring  
an employer is held responsible for its  
hiring decisions. This is a theory of direct  
liability. The allegations in petitioners  
claim also covers the theory of respon-  
dent superior, in which the employee  
must have been acting within the  
scope of his employment at the time  
of the wrong doing, and the employer  
is held liable for the employee's  
bad act "as an elder or ministerial -  
servant than person is held responsible  
for all their actions as such at (all)  
times in their lives even more so  
after such appointment" Thus the  
petitioner alleges both causes of liabil-  
ity, that pertains to Watch Tower,  
Christian Congregation of Jehovah's Witnesses  
Inc., and Christian Congregation of -  
Jehovah's Witnesses of Muskogee Oklahoma  
Also showing that Samuel Portis



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and Frank Lee were both hired/retained by Watch Tower, Christian Congregation of Jehovah's Witnesses Inc and Christian Congregation of Jehovah's Witnesses of Muskogee Oklahoma.

These acts of molestation were reported to the Christian Congregation of Jehovah's Witnesses of Oklahoma City "Central Congregation" after petitioner became actually aware of the wrongs done to him as a child. It was in 1996, more or about when examined by Dr Schm - Smider, retained by "Federal Court" Public Defender William P. Early that petitioner became aware & understood the harm - done. It was in 1997 or so when petitioner reported it to the Central Congregation of Oklahoma City, The Central Congregation and all others failed to report said abuse.

Respectfully

Submitted

William Harding

[Signature]

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5-16-21